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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LN MANAGEMENT LLC SERIES 7241  
BROOK CREST,

Plaintiff,

vs.

BRANDON JHUN, an individual; ELSKE  
VAN HEMERT, an individual; WELLS  
FARGO BANK, N.A.; DEPARTMENT OF  
THE TREASURY – INTERNAL  
REVENUE SERVICE; ON CALL CASH,  
LLC, a Nevada Limited Liability Company;  
and DOES 1 through 10, inclusive,

Defendants.

Case No. 2:14-cv-01936-APG-EJY

**STIPULATION AND ORDER FOR  
DISMISSAL OF WELLS FARGO BANK,  
N.A. WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiff LN Management LLC Series 5204 Painted Sands (“LN Management”), Defendant Wells Fargo Bank, N.A. (“Wells Fargo”), and Defendant Internal Revenue Service (“IRS”)(collectively, the “Parties”<sup>1</sup>), by and through their respective counsel, agree that:

<sup>1</sup> Defendants Jhun and Van Hemert were previously defaulted by this Court on May 19, 2014. Defendant On Call Cash was previously defaulted by this Court on October 7, 2014.

1           **IT IS HEREBY STIPULATED AND AGREED** that the Deed of Trust recorded as  
 2 instrument number 20090612-0005629 (the “**Wells Fargo DOT**”) in the official records of the  
 3 Clark County Recorder, is being quieted pursuant to a confidential settlement between LN  
 4 Management and Wells Fargo, and LN Management is paying Wells Fargo consideration that is  
 5 subject to a confidential settlement agreement. The Wells Fargo DOT is null and void and of no  
 6 further force or effect, and title is quieted in the name of LN Management LLC Series 7241  
 7 Brook Crest (“**LN Management**”) as to the property described in the Wells Fargo DOT as  
 8 follows:

9           APN: 125-15-313-002  
 10          **PARCEL ONE (1):**

11          Lot Nineteen 919) in Block Three (3) of Amended Plat of a Portion of Saltcreek, as shown  
 12 by map thereof on file in Book 92 of Plats, Page 20, in the Office of the County Recorder  
 in Clark County, Nevada.

13          **PARCEL TWO (2):**

14          A non-exclusive easement for ingress, egress, and enjoyment in and to the association  
 15 property as set forth in the Declaration of Covenants, Conditions, and Restrictions for  
 16 Saltcreek a common interest community, recorded December 16, 1999 in Book 991216 as  
 Document No. 00827, as the same may from time to time be amended and/or  
 supplemented in the Office of the County Recorder of Clark County, Nevada, which  
 easement is appurtenant to Parcel One (1).

17           **IT IS FURTHER STIPULATED AND AGREED** that nothing in this Stipulation and  
 18 Order, or the relief granted herein, shall be construed or deemed to alter, affect, limit, waive, or  
 19 restrict the rights of Wells Fargo (or any of its authorized agents, investors, affiliates,  
 20 predecessors, successors, and assigns) relating to the promissory note (the “**Note**”) described in  
 21 the Wells Fargo DOT and/or any mortgage related thereto.

22           LN Management and Wells Fargo further agree that this Stipulation and Order is in no  
 23 way intended to impair the rights of Wells Fargo (or any of its authorized agents, investors,  
 24 affiliates, predecessors, successors, and assigns) to pursue any and all remedies against the  
 25 Borrower(s), as defined in the Wells Fargo DOT and/or Note, that Wells Fargo (or any of its  
 26 authorized agents, investors, affiliates, predecessors, successors, and assigns) may have relating  
 27 to the Note, except the right to judicially or non-judicially foreclose/enforce the Wells Fargo DOT  
 28 against the property described in the Wells Fargo DOT.

